

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

BROAD-BUSSEL FAMILY LIMITED  
PARTNERSHIP, MARIE LOUISE  
MICHELSON, MICHELLE MICHELSON,  
and HERBERT BLAINE LAWSON, JR.,  
Individually and on Behalf of All Other  
Persons and Entities Similarly Situated,

Plaintiffs,

vs.

BAYOU GROUP LLC,  
BAYOU MANAGEMENT, LLC,  
BAYOU FUND, LLC,  
BAYOU SUPER FUND, LLC,  
BAYOU NO LEVERAGE FUND LLC,  
BAYOU AFFILIATES FUNDS, LLC,  
BAYOU ACCREDITED FUND, LLC,  
BAYOU OFFSHORE FUND, LCC,  
BAYOU PARTNERS LLC,  
BAYOU SECURITIES, LTD.,  
BAYOU ADVISORS, LLC,  
BAYOU EQUITIES, LLC,  
IM PARTNERS, IMG, LLC  
SAMUEL ISRAEL, III, DANIEL E. MARINO,  
RICHMOND-FAIRFIELD, ASSOCIATES,  
CPA, PLLC, JAMES G. MARQUEZ,  
JEFFREY D. FOTTA, EQYTY RESEARCH  
AND MANAGEMENT, LLC,  
EQYTY RESEARCH AND MANGEMENT LTD,  
CITIBANK N.A.  
HENNESSEE GROUP LLC,  
ELIZABETH LEE HENNESSEE,  
CHARLES J. GRADANTE, and  
STERLING STAMOS CAPITAL  
MANAGEMENT, L.P.,

Defendants.

CIVIL ACTION:  
3:05 CV 1762 (JBA)

DECEMBER 22, 2005

**MOTION FOR ADMISSION**  
**PRO HAC VICE OF MATTHEW PLANT**

In accordance with D. CONN. L. CIV. R. 83.1(d), the undersigned attorney, duly admitted to practice before this Court, hereby moves that Matthew Plant, Esq., be permitted to represent the defendants Hennessee Group, LLC, Elizabeth Lee Hennessee and Charles J. Gradante in the above-captioned action for all matters related to this case, in addition to counsel of record who have already appeared for the defendants. Matthew Plant, Esq., is an attorney admitted to practice before the state court of New York, the United States District Courts for the Southern District of New York. In support of this motion, the undersigned states:

1. Matthew Plant, Esq. is an associate of the law firm of Bressler, Amery & Ross, P.C., 17 State Street, New York, New York 10004.
2. An affidavit setting forth the necessary information regarding the qualification of Matthew Plant, Esq., to practice before this Court along with such other information required by D. CONN. L. CIV. R. 83.1(d) is attached hereto as Exhibit A and made a part hereof.
3. The undersigned has agreed to act as local counsel for Hennessee Group, LLC, Elizabeth Lee Hennessee and Charles J. Gradante in this proceeding and, as such, agrees to be the Connecticut recipient of all pleadings and communications on behalf of the defendant Hennessee Group, LLC, Elizabeth Lee Hennessee and Charles J. Gradante. All pleadings and communications may be sent to Marc J. Grenier at the following address and telephone number:

Marc J. Grenier (ct10545)  
DePanfilis & Vallerie, LLC  
25 Belden Avenue  
P.O. Box 699  
Norwalk, CT 06852-0699  
Telephone: 203-846-9585  
Facsimile: 203-847-2849  
E-mail: [marcgrenier@depanfilisandvallerie.com](mailto:marcgrenier@depanfilisandvallerie.com)

**CERTIFICATION**


This is to certify that a copy of the above Pro Hace Vice was mailed or electronically delivered on the 22nd day of December 2005 to all parties of record as follows:

William M. Bloss, Esq.  
Koskoff, Koskoff & Bieder, P.C.  
350 Fairfield Avenue  
Bridgeport, CT 06604

Patrick J. McHugh, Esq.  
Finn Dixon & Herling  
One Landmark Square, Suite 1400  
Stamford, CT 06901

Sung-Hee Suh, Esq.  
Schulte, Roth & Zabel, LLP-NY  
919 Third Avenue  
New York, New York 10022

William Morten Tong, Esq.  
Finn Dixon & Herling  
One Landmark Square  
Suite 1400  
Stamford, CT 06901

  
Marc J. Grenier (ct10545)

**Exhibit A**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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MANAGEMENT, L.P.,

Defendants.

CIVIL CASE:  
3:05 CV 1762 (JBA)

DECEMBER 22, 2005

**AFFIDAVIT IN SUPPORT OF MOTION**  
**FOR PERMISSION TO APPEAR PRO HAC VICE**

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF NEW YORK    )

Matthew C. Plant, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen (18) years and I understand the nature and obligations of an oath.

2. I am an associate of the law firm of Bressler, Amery & Ross, P.C. and may be reached through the following contact information:

Matthew C. Plant  
Bressler, Amery & Ross, P.C.  
17 State Street  
New York, New York 10004  
Telephone: 212-425-9300  
Facsimile: 212-425-9337  
mplant@bressler.com

3. I submit this affidavit in support of a motion to be admitted to practice before this Court in the above-captioned matter as a visiting attorney *pro hac vice* pursuant to D.CONN. L. CIV.R. 83.1(d).

4. I am a member in good standing of the bar of the State of New York. I am also admitted and in good standing in the United States District Court for the Southern District of New York.

5. I have not been denied admission or disciplined by this Court or any other Court.

6. I have fully reviewed and I am familiar with the Rules of the United States District Court of the District of Connecticut.


7. The granting of this motion will not require modification of any scheduling order entered by this Court pursuant to FED. R. CIV.P. 16(b) or the standing order on scheduling in civil cases.

8. I have requested that Marc J. Grenier, Esq. of the firm of DePanfilis & Vallerie, LLC, 25 Belden Avenue, Norwalk, CT 06852 act as local counsel, and I understand that he will be receiving service of papers and communications in this matter with me on behalf of defendants Hennessee Group, LLC, Elizabeth Lee Hennessee and Charles J. Gradante.



Matthew C. Plant

Subscribed and sworn to  
before me this 22nd day of  
December, 2005

  
Notary Public  
My Commission Expires:

JACQUELINE KELLEHER  
Notary Public, State of New York  
No. 01KE6037211  
Qualified in Richmond County  
Commission Expires February 14, 2006

**CERTIFICATION**


This is to certify that a copy of the above Affidavit in Support of Motion For Permission to Appear Pro Hac Vice was mailed or electronically delivered on the 22nd day of December 2005 to all parties of record as follows:

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